

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Jeffrey Baker, a Special Agent with the Federal Bureau of Investigation, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property, a residential dwelling described in Attachment A, and the extraction from that property of evidence described in Attachment B.

2. I am a Special Agent for the Federal Bureau of Investigation (FBI). I have been an FBI Agent with the Southeastern Wisconsin Regional Gang Task Force since October of 2017. I have received training in the investigation of drug trafficking. I have worked with informants in the investigation of drug trafficking in the Milwaukee area. I have participated in search warrants, investigations, and arrests in which controlled substances and drug paraphernalia were seized. I am familiar with the street names of various drugs in the Milwaukee area including marijuana, heroin, and cocaine. I am familiar with methods that are commonly used by drug dealers to package and prepare controlled substances for sale in the Milwaukee area. Through my training and experience, I know that drug dealers are not on a regular schedule and can conduct drug deals at any time of the day.

3. As a Special Agent, I have participated in the investigation of narcotics-related offenses, resulting in the prosecution and conviction of individuals and the seizure of illegal drugs, weapons, stolen property, United States currency, and other

7. I know that drug traffickers often list their telephones in nominee names in order to distance themselves from telephones that are used to facilitate drug trafficking; and that drug traffickers frequently change phone numbers in an effort to thwart law enforcement.

8. I know that drug traffickers often use drug proceeds to purchase assets such as vehicles, property, and jewelry. I also know that drug traffickers often use nominees to purchase and/or title these assets in order to avoid scrutiny from law enforcement.

9. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

10. As detailed below, I believe that there is probable cause that located within the following properties in the City of Milwaukee, further described in Attachment A, are items that constitute evidence of drug trafficking, including violations of Title 21, United States Code, sections 841 and 846.

IDENTIFICATION OF PREMISES AND VEHICLES TO BE SEARCHED

11. That affiant is requesting permission to execute a search warrant at the following properties and vehicles:

entrance apartment four is located on the second floor on the east side of the apartment building. The entry door is white and is the northern most door on the east side of the apartment building.

F. 3071A North 19th Street, Milwaukee, Wisconsin

The upper of a two-story duplex having yellow exterior siding and a red-shingled roof. The number "3071A" is displayed in a horizontal fashion on the east side of the house. The entrance door to 3071A is a white door on the south side of the building.

G. 3044 North Richards Street, Milwaukee, Wisconsin

The lower of a two-story duplex having white aluminum siding with white trim and a brown-shingled roof. The number "3044" is displayed in a horizontal fashion to the south of the west facing security gated front door.

H. 5800 North 91st Street, Northeast First Floor Apartment Milwaukee, Wisconsin

Multi-unit apartment complex having a tan brick exterior with brown and white window trim and a red-shingled roof; that "5800" is displayed in a horizontal fashion above the double white west facing front entry doors. The entrance to the target location is located on the first floor in the northeast corner of the apartment building. The entry door is white and is located on the east side of the apartment building and faces east. The entry door is the northern most door on the east side of the building.

I. Black 2013 Cadillac XTS, WI registration 659-ZH, VIN#2G61W5S36D9220166, registered to Harris James Trust.

J. White 2014 Lincoln MKT, WI registration ACV-2418, VIN#2LMHJ5AT2EBL54470, registered to Jasmine Grace (Roderick Ramsey's Girlfriend).

12. The applied-for warrant would authorize the search and recovery of evidence particularly described in Attachment B.

information corroborated by law enforcement through consensually recorded conversations, controlled buys, and other witness and law enforcement reporting.

16. In early 2017 and while inside of 2773A N. 41st Street, Milwaukee, WI, CS1 saw Harris packaging a half-kilo of heroin for sale, and s/he saw Harris use Dormin as a cutting agent prior to its packaging.

17. CS1 identified James Coleman, Kurt Parks, Roderick Ramsey, and Todd McGown as heroin traffickers who purchased their heroin from Harris between January 2017 and April 2017. CS1 also personally observed Roderick Ramsey, Harris' nephew, deliver heroin to Coleman for sale.

18. CS1 further stated that Harris once called CS1 and told him/her that Harris was in Chicago picking up heroin from his source of supply.

19. In 2017, members of the FBI GTF, developed a confidential source (hereinafter referred to as CS4). CS4's information dates from January 2017 to the present.

20. For several reasons, case agents believe that CS4 is reliable and credible. First, CS4 has been providing continuous information since approximately June of 2017. Second, the information CS4 has provided is substantially against CS4's penal interest. Third, the information provided by CS4 is consistent with evidence obtained elsewhere in this investigation where CS4 was not utilized, and substantial portions of CS4's information have been corroborated through independent investigation, including surveillance and information from other sources. Finally, CS4 has had an adequate opportunity to observe directly the events discussed and/or has heard conversations directly from the individuals discussed herein. CS4 is cooperating in exchange for

24. CS4 also believes that Harris receives his heroin from a relative in Chicago because he heard Harris and Kurt Parks discussing that arrangement.

25. In 2018, members of the FBI GTF developed a confidential source (hereinafter referred to as CS6).

26. For several reasons, case agents believe that CS6 is reliable and credible. First, CS6 has been providing continuous information since April of 2018. Second, the information provided by CS6 is consistent with evidence obtained elsewhere in this investigation where CS6 was not utilized, and substantial portions of CS6's information have been corroborated through independent investigation, including surveillance and information from other sources. Finally, CS6 has had an adequate opportunity to observe directly the events discussed and/or has heard conversations directly from the individuals discussed herein. CS6 is cooperating in exchange for credit towards CS6 pending criminal case.

27. CS6 stated s/he had been purchasing heroin three times a week from a subject s/he know as "Rah Rah" since June/July of 2017 at 3044 North Richards Street, Milwaukee, WI, and at an apartment of the lower northeast corner of the an apartment complex located at 5800 North 91st Street, Milwaukee, WI. Case agents know "Rah Rah" to be Roderick Ramsey, who is James Harris nephew. Case agents showed CS6 a Milwaukee Police Department booking photo of Roderick Ramsey, which CS6 positively identified as the subject CS6 knows as "Rah Rah."

28. CS6 stated that in May 2018, s/he observed James Harris at Roderick Ramsey's residence 3044 North Richards Street, Milwaukee, WI, when CS6 was

Each time Harris purchased heroin, it was never less than a kilo. The FBI was able to verify the identity of Stanley George and verified that Harris' mother does reside in Chicago. CS7 identified Adline Harris, Harris' wife, as a person who often transports heroin from Chicago to Milwaukee for the Harris DTO.

32. In 2018, members of the FBI GTF, developed a confidential source (hereinafter referred to as CS8).

33. For several reasons, case agents believe that CS8 is reliable and credible. First, the information provided by CS8 is consistent with evidence obtained elsewhere in this investigation where CS8 was not utilized, and substantial portions of CS8's information have been corroborated through independent investigation, including surveillance and information from other sources. Second, CS8 has made statements to case agents that are against his/her penal interests, in that CS8 has admitted his/her involvement in the Harris DTO's activities in the past. Finally, CS8 has had an adequate opportunity to observe directly the events discussed and/or has heard conversations directly from the individuals discussed herein. CS8 is cooperating in exchange for consideration in a pending criminal case.

34. CS8 worked with the Harris DTO from spring 2016 to spring 2017. CS8 saw Harris receive heroin from a Chicago source. CS8 saw Harris package heroin almost every day, and CS8 saw Harris cut the heroin with Dormin. CS8 assisted the packaging of Harris' heroin, and s/he said that Harris would receive approximately 2-3 kilos of heroin every month. CS8 saw James Coleman and Kurt Parks purchase heroin almost every day from Harris - at times, Harris fronted the heroin to James Coleman and Kurt Parks.

through telephone records. Unless otherwise noted, the controlled buys and telephone contacts summarized below were conducted pursuant to the above procedures.

37. The below controlled buys are believed to be connected to members or associates of the Harris DTO:

- On April 22, 2017, the FBI GTF conducted a controlled buy of heroin from James Coleman of 2.52 grams of heroin at 4200 W. Stark Street, Milwaukee.
- On April 24, 2017, the FBI GTF conducted a controlled buy from James Coleman of 4.3 grams of heroin at 1200 W. Garfield Avenue, Milwaukee.
- On May 12, 2017, the FBI GTF conducted a controlled buy from James Coleman of 9.11 grams of heroin at 2655 N. 15th Street, Milwaukee. During the controlled buy, James Coleman. The CI stated that Skinner was selling heroin to other buyers during the controlled buy (this was not captured on the recording).
- On May 24, 2017, the FBI GTF conducted a controlled buy from James Harris and Roderick Ramsey of 7.8 grams of heroin at 2773 N. 41st Street, Milwaukee. CS1 called Harris who directed CS1 to call Roderick Ramsey to fulfill the request. CS1 called Ramsey who sold the heroin to CS1.
- On July 21, 2017, the FBI Task Force conducted a controlled buy from Don Tillman of 2.2 grams of heroin at 2605 N. 26th Street,

- On April 12, 2018, FBI GTF conducted a controlled buy from Todd McGown of 4.5 grams of heroin at 3110 North 35th Street, Milwaukee.
- On April 17, 2018, FBI GTF conducted a controlled buy from Casey Johnson of 2.83 grams of heroin at 3069 North 29th Street, Milwaukee. During the controlled buy, CS4 spoke to Terry who said call his guy "KC."
- On April 20, 2018, FBI GTF conducted a controlled buy from Casey Johnson of 4.87 grams of heroin at 3069 North 29th Street, Milwaukee.
- On May 15, 2018, FBI GTF conducted a controlled buy from Antoine Jeff of 1.55 grams of heroin at 3261 North 30th Street, Milwaukee.
- On May 17, 2018, FBI GTF conducted a controlled buy from Todd McGown of 4.5 grams of heroin at 3500 West Fond Du Lac Avenue, Milwaukee.
- On May 21, 2018, FBI GTF conducted a controlled buy of heroin from Roderick Ramsey of 1.02 grams of heroin at 2940 North 21st Street, Milwaukee.
- On May 24, 2018, FBI GTF conducted a controlled buy of heroin from Nequann Terry of 2.06 grams of heroin at 6016 North 61st Street, Milwaukee. During the controlled buy, CS4 spoke with Harris and Terry outside of 6016 North 61st Street, and at that time, Harris directed Terry to "Take care of that business." Shortly after, CS4 and

- On July 25, 2018, the FBI GTF conducted a controlled buy from "Luther" of 2.71 grams of heroin in the area of 3071 N 19th Street, Milwaukee.
- On July 30, 2018, the FBI GTF conducted a controlled buy from Roderick Ramsey of 0.58 grams of heroin in the area of 3044 North Richards Street.

1815 1st Avenue, Grafton, Wisconsin

38. Agents of the FBI GTF believe that 1815 1st Avenue, Grafton, WI, is occupied by James Harris and his wife, Adline Harris. At the beginning of June 2018, CS4 alerted case agents that James Harris and Adline Harris moved from their residence located at 9401 West Calumet Road #208, Milwaukee, WI, to a location in Grafton Wisconsin. On June 1, 2018, James Harris updated his Wisconsin Department of Corrections address to 1815 1st Avenue, Grafton, WI (Harris is currently on active Wisconsin Department of Corrections supervision). On June 14, 2018, both James Harris and Adline Harris updated their Wisconsin Department of Transportation address to 1815 1st Avenue, Grafton WI. As of June 2, 2018, Adline Harris is the listed utilities subscriber through WE Energies for 1815 1st Avenue in Grafton, WI.

39. Through telephonic electronic surveillance, case agents placed James Harris' cellphone at 1815 1st Avenue in Grafton, WI, more than 10 times since June 1, 2018. On July 24, 2018, case agents personally observed James Harris enter the residence located at 1815 1st Avenue, Grafton, WI.

40. Case agents know that James Harris has a history of keeping heroin at one

Apartment #5 within the last 60 days. CS4 identified Terry as a current heroin dealer for the Harris DTO who resides at and furthers heroin trafficking at 330 West Keefe Avenue, Apartment #5, Milwaukee, WI.

46. CS4 stated that the entry door to Apartment #5 is barricaded. The barricades consist of a horizontal 2x4 across the door and a 2x4 inserted into a floor bracket which provides additional fortification. I know that from training and experience that drug dealers use fortification in order to secure their residences from law enforcement and others individuals attempting to gain access to their residence.

47. On February 17, 2018, Milwaukee police officers were dispatched to a property damage complaint at 330 West Keefe, Milwaukee, WI. The caller stated that her landlord was "J. Harris" with a cellphone number of 414-595-7809. Case agent know this to be one of James Harris's cellphone numbers.

48. Based off electronic and physical surveillance, case agents have placed James Harris at 330 West Keefe Avenue over 100 times, most recently on July 24, 2018. In addition, case agents case agents have placed Nequann Terry at 330 West Keefe through physical surveillance approximately 10 times, most recently on July 24, 2018.

49. Case agents also observed James Harris 2013 Cadillac XTS, with Wisconsin license plate 659-ZHL parked at 330 West Keefe on over 25 occasions, most recently on July 25, 2018. Law enforcement verified that this vehicle is registered through WI DOT to James Harris Trust and used by Harris. Case agents have observed Harris driving the Cadillac XTS over 20 times.

50. In my training and experience as a federal agent, I know that it is a common

- On May 12, 2017, the FBI Task Force conducted a controlled buy from James Coleman of 9.11 grams of heroin at 2655 N. 15th Street, Milwaukee. The CI stated that Justin Skinner, Coleman's son, was selling heroin to other buyers during the controlled buy.
- On June 4, 2018, the FBI Task Force conducted a controlled buy from James Coleman of .16 grams of heroin at 2655 N. 15th Street, Milwaukee.

54. CS1, CS7, and CS8 identified Coleman as a member of the Harris DTO.

55. CS1 stated that between January 2017 and April 2017, s/he worked as a heroin dealer for James Coleman out of 2655 N. 15th Street, Milwaukee, WI.

56. CS4 identified Coleman as a current heroin dealer for the Harris DTO who resides at 2665 North 15th Street, Milwaukee, WI.

57. In my training and experience as a federal agent, I know that it is a common for a drug trafficker's residence to contain evidence of drug trafficking, such as contraband, proceeds, and records.

3261 North 30th Street, Milwaukee, Wisconsin

58. Agents of the FBI GTF believe that 3261 North 30th Street, Milwaukee, WI, is occupied by Antoine Jeff. Jeff's current address through the Wisconsin Department of Transportation, which he updated on March 25, 2014. The listed utilities describer through WE Energies is Danielle Pinkston.

59. CS4 identified Kurt Parks' heroin workers as Don Tillman, Antoine Jeff, and Casey Johnson. CS4 saw Antoine Jeff purchase a half-ounce of heroin from Harris

#4, Milwaukee, WI. The listed utilities subscriber through WE Energies is Mandisa Dempsey.

66. On May 16, 2017, Milwaukee Police responded to 3110 North 35th Street Apartment #4. The caller identified himself as Todd McGown. McGown stated that his vehicle was stolen from the location.

67. On April 10, 2018, the FBI GTF conducted a controlled buy of heroin from Todd McGown at 3110 North 35th Street, Apartment #4. CS4 purchased 2.39 grams of heroin with \$200.00 in controlled buy money.

68. On April 12, 2018, FBI GTF conducted a controlled buy of heroin from Todd McGown at 3110 North 35th Street, Apartment #4. CS4 purchased 4.5 grams of heroin with \$300.00 in controlled buy money.

69. On May 17, 2018, FBI GTF conducted a controlled buy of heroin from Todd McGown in the parking lot across the street from 3500 West Fond Du Lac. CS4 purchased 4.5 grams of heroin with \$300.00 in controlled buy money. This parking lot is approximately 200 feet west of 3110 North 35th Street.

70. On July 25, 2018, the FBI GTF conducted a controlled buy from "Herron" at the direction of Todd McGown. CS4 purchased 2.93 grams of heroin with \$300.00 of controlled buy money in the gangway to the south of 3043 North 35th Street, Milwaukee. This location is approximately one block south 3110 North 35th Street.

71. Case agents physically observed McGown in the alley adjacent to 3110 North 35th Street in early July 2018.

72. In my training and experience as a federal agent, I know that it is a common

during the buy "Luther" brought the controlled buy money into the house and gave it to Marques Williams.

77. On July 12, 2018, the FBI GTF conducted a controlled buy from "Luther" an unknown black male at the direction of Marques Williams of 2.98 grams of heroin from the alley directly across the street from 3071A North 19th Street, Milwaukee. CS4 stated that during the buy "Luther" got a portion of the heroin from 3071A North 19th Street. At the conclusion of this controlled buy, case agents remained around the residence and conducted surveillance on 3071 N 19th Street. Case agents witnessed several suspected narcotics transactions. The majority of the suspected narcotics transactions were done with the suspected buyer in a vehicle doing a hand-to-hand transaction with the suspected seller on a bicycle. It should be noted that the two subjects on bicycles were using hand signals and most cars were in the alley for less than a minute which case agents know to be typical behavior for street level narcotics sales. The most common pattern that case agents witnessed was the driver of a vehicle would drive east on Chambers Street, then drive northbound through the alley, and would exit out of the gas station. Case agents noted that the suspected narcotics transactions that were witnessed were done either in the alley or on 19th Street. Case agents stated that on multiple occasions they witnessed the black male wearing the blue baseball hat (case agents know this to be "Luther") walk toward the residences on the west side of 19th Street.

78. On July 25, 2018, the FBI GTF conducted a controlled buy from "Luther" an unknown black male of 2.71 grams of heroin in the alley between 18th Street and 19th

that her live-in boyfriend, Roderick Ramsey, struck her in the face several times with a closed fist.

86. On Thursday March 29, 2018, DEA Agents were conducting surveillance on 3044 North Richards Street when they observed a male enter and exit the residence in a short amount of time. Subsequently the male was arrested and questioned by law enforcement. The male indicated that he had been purchasing heroin from Roderick Ramsey every two days for the last two months. The male stated that he has been at 3044 North Richards Street more than 20 times. The male physically pointed out the address of 3044 North Richards as the location where he met Ramsey earlier that morning to obtain heroin.

87. In March 2018, case agents observed Ramsey exit 3044 North Richards Street and lock the Chicago gate behind him using keys.

88. On July 3, 2018, case agents observed Ramsey in the doorway of 3044 North Richards Street with an unknown black female.

89. On July 30, 2018, the FBI GTF conducted a controlled buy of heroin from Roderick Ramsey in the area of 3044 North Richards Street. During the recorded cellphone call, Ramsey asked if CS6 was closer to 91st Street or to Richards Street. CS6 informed Ramsey that CS6 was closer to 3044 North Richards Street - the heroin purchase was arranged to take place at that location. Case agents set up surveillance on 3044 North Richards Street. A short time later, case agents observed Ramsey driving his girlfriend's white Lincoln MKT bearing license plate ACV-2418 drive southbound on North Richards Street. Case agents observed Ramsey driving this vehicle approximately five times since

Milwaukee, WI; and (2) 5800 North 91st Street, Milwaukee, WI. CS6 stated that 5800 North 91st Street is an apartment building. CS6 would enter the back door to the apartment into the kitchen. CS6 stated that the door to enter the apartment is the door that is furthest north at the rear of the apartment building. CS6 was unable to see what apartment number is associated with the apartment due to entering the rear door.

93. On May 29, 2018, FBI GTF conducted a controlled buy of heroin from Roderick Ramsey at 5800 North 91st Street, northeast 1st floor apartment, which is the northern most entry door on the east side of the building. CS6 purchased 0.55 grams of heroin for \$60.00 in controlled buy money. CS6 stated that CS6 followed Ramsey to the western bedroom to conduct the controlled buy and observed a plate containing what CS6 to be between 10-15 grams of heroin.

94. During a controlled buy on July 30, 2018, Ramsey asked CS6 if s/he was closer to this location at 5800 North 91st Street or the location at 3044 North Richards Street. The controlled buy ultimately occurred in the area of 3044 North Richards Street.

CONCLUSION

95. Based on the facts contained within this affidavit, case agents believe that there is probable cause that James Harris, Adline Harris, James Coleman, Kurt Parks, Nequann Terry, Roderick Ramsey, Todd McGown, Casey Johnson, Don Tillman, Antoine Jeff, and Marques Williams are heroin traffickers. Case agents further believe that there is probable cause to search the aforementioned locations and vehicles for evidence pertaining to the fruits, instrumentalities, and proceeds of drug trafficking, all of which are detailed more specifically in Attachment B, items to be seized.

flash memory cards or miniature hard drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

99. IP Address: An Internet Protocol address (or simply "IP address") is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

100. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

101. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods. Similarly, things that have been viewed via the Internet are typically stored for some period on the device. This information can sometimes be recovered with forensics tools.

102. There is probable cause to believe that things that were once stored on the devices may still be stored there, for at least the following reasons:

106. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or "cache."

107. Forensic evidence. As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the devices were used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the devices because:

108. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created.

109. Forensic evidence on a device can also indicate who has used or controlled the device. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence.

does not involve the physical intrusion onto premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

the house. The entrance door to 3071A is a white door on the south side of the building.

G. 3044 North Richards Street, Milwaukee, Wisconsin

The lower of a two-story duplex having white aluminum siding with white trim and a brown-shingled roof. The number "3044" is displayed in a horizontal fashion to the south of the west facing security gated front door.

H. 5800 North 91st Street, Northeast First Floor Apartment Milwaukee, Wisconsin

Multi-unit apartment complex having a tan brick exterior with brown and white window trim and a red-shingled roof; that "5800" is displayed in a horizontal fashion above the double white west facing front entry doors. The entrance to the target location is located on the first floor in the northeast corner of the apartment building. The entry door is white and is located on the east side of the apartment building and faces east. The entry door is the northern most door on the east side of the building.

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As used above, the terms "records" and "information" include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as hard disks or other media that can store data); any handmade form (such as writing, drawing, painting); any mechanical form (such as printing or typing); and any photographic form (such as microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or photocopies).